

# EXHIBIT M

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Cung Le, Nathan Quarry, Jon Fitch )Case No: 2:15-cv-01045-RFB(PAL)  
Brandon Vera, Luis Javier Vazquez,) )  
and Kyle Kingsbury on behalf of ) )  
themselves and all others ) )  
similarly situated, ) )  
 ) )  
Plaintiff, ) )  
 ) )  
vs. ) )  
 ) )  
Zuffa, LLC, d/b/a Ultimate ) )  
Fighting Championship and UFC, ) )  
 ) )  
 ) )  
Defendants. ) )

VIDEO DEPOSITION OF NATHAN QUARRY

taken at 300 South Fourth Street, Suite 800,  
Las Vegas, Nevada 89101, beginning at 9:09 A.M.  
and ending at 4:59 P.M. on Friday, September 30, 2016

Reported by:

Sarah Padilla  
CCR NO. 929

Job No. 270538  
Pages 1-297

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1 BY MR. ISAACSON:

2 Q So bottom line, Exhibit 31 was the terms  
3 of your management agreement with Mr. Aspinwall?

4 A Yes.

5 Q All right this will be 32.  
6 (Exhibit 32 was marked.)

7 BY MR. ISAACSON:

8 Q 32 is Bates stamped Ibarra 24019 through  
9 24029, meaning this is produced from Mr. Ibarra. On  
10 the first page there's an e-mail to you to from  
11 Mr. Ibarra dated October 5, 2012. And there's  
12 e-mails, other e-mails in October 2012 throughout  
13 this. The last page just seems to be the -- the  
14 last couple pages just seem to be disclaimers.

15 So if I can ask you -- you were discussing  
16 in this with your manager some specific events or  
17 promotions here. So please review it, but I would  
18 like to find out what the subject matter of this is?

19 MR. CRAMER: Take your time to take a look  
20 at it.

21 BY MR. ISAACSON:

22 Q I think you'll find if you start at page 8  
23 and work your way backwards, that is the substance.  
24 Everything else after that is e-mail disclaimers.

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25 And if it helps your memory, this reference is to a

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1 Kizuna MMA event in Argentina.

2 A I believe I was approached by a couple  
3 people that were looking to start some type of MMA  
4 promotion, I think in Argentina called Kizuna.

5 Q Did the event in Argentina happen?

6 A I don't know. It didn't happen with me if  
7 it did. I don't really have any knowledge of that.

8 Q Now, on page -- there's a page No. 4 at  
9 the bottom, it's Bates stamped 24022. There's an  
10 e-mail from you on that page that, in the middle  
11 talks about, "Gary would undertake the role of Joe  
12 Silva." Do you see that?

13 A Yes.

14 Q Now is Gary, Mr. Ibarra?

15 A Yes.

16 Q And so that, by undertaking the role of  
17 Joe Silva, he would set up the matches; is that  
18 right?

19 A Yes, he would be the one to find the  
20 fighters and do the matchups.

21 Q And you say -- you go on to say later in  
22 the paragraph, "They will come calling. I don't  
23 think we'll have too difficult of a time filling the  
24 card with talent." What were you referring to

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25 there?

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1 A When you're putting on a low-level show,  
2 you can always find a lot of people to fight. In  
3 Portland we have the Full Contact Fighting  
4 Federation, which is an amateur show, and in every  
5 card is filled with 12 or 15 fights. So when you  
6 looking at just a low-level show, it's generally  
7 pretty easy to find fighters to fill that. You'll  
8 still have exciting fights, they just won't be top  
9 talent.

10 Q And then on page 2 at the top, you say,  
11 "Since this is going to be a partnership between us,  
12 I'd like you to continue to run things by me before  
13 announcing to the group. It's the four of us."  
14 Who's the group of the four of you?

15 A This was four years ago. I don't recall.  
16 I think you would have to read through the e-mails  
17 to find out everyone's name. Looks like Martin  
18 Wilde, Lucas Lugo, myself, and Gary Ibarra.

19 Q Earlier in the deposition you used the  
20 term "elite." Do you have a definition of what an  
21 elite MMA fighter is?

22 A Boy, the elite fighters, that's, again,  
23 going back to the pornography reference. I don't  
24 know how to explain it, but I know it when I see it.

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25 There's one big difference between run of the mill

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1 fighters and the elite fighters. They have the  
2 talent and the drive.

3 Much like in jujitsu, you have the white  
4 belt, the blue belt, the purple belt, the brown  
5 belt, and the black belt. The elite jujitsu  
6 practitioners are the black belts. It's a matter of  
7 the skill level that becomes the elite fighters.

8 Q Can you give examples in the UFC of  
9 fighters you consider to be elite?

10 A Yes.

11 Q Would you give me a couple examples?

12 A Boy, I'm terrible at just listing names,  
13 but you start with all the champions, all of the  
14 contenders, and just work your way down from there.

15 Q Can you give me examples of fighters in  
16 the UFC who you consider to be not elite?

17 A I think the fighters who are not elite in  
18 the UFC, as far as fighting skill, wash out very  
19 quickly. That may be someone who came in through  
20 the Ultimate Fighter, made it through for one reason  
21 or another, started competing in the UFC and just  
22 did not have the skill level to compete at the  
23 higher levels.

24 Then you have someone that -- and you have

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25 others that just bring notoriety, such as someone